

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

Summers No. 8117

A

BIANCA JOHNSON and DELMAR  
CANADA,

Plaintiffs,

v.

ANDREW HOLMES,

Defendant.

Case No. 3:16-cv-00016

SUBPOENA TO PRODUCE DOCUMENTS

To: Albemarle County Police Department, 1600 5<sup>th</sup> Street, Charlottesville, VA 22902

**YOU ARE COMMANDED** to produce at 913 E. Jefferson Street, Charlottesville, VA 22902 on **February 28, 2020** at 10:00 a.m. the following documents:

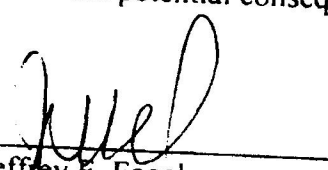
1. A list of aggregate traffic summonses, broken down by race, issued by all officers who worked Sectors 1 and 2 in 2015 except Andrew Holmes. The format should be as appears in Exhibit A hereto;
2. All documents which reflect who in the Albemarle County Police Department directed that the list that appears as Exhibit A hereto be prepared;
3. All documents which reflect who prepared the report which appears as Exhibit A hereto.
4. All documents which reflect whether the designation of "citations" at the top of Exhibit A refers to traffic summonses or includes other summonses as well. If it includes other summonses, provide a breakdown of other summonses issued by the officers (other than Andrew Holmes) in Sector 1 and 2 in 2015.

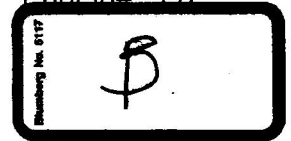
The following provisions of Fed. R. Civ. P 45 are attached - Rule 45 (c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 2/10/2020

Albemarle County

FEB 12 2020

  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

BIANCA JOHNSON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 3:16cv16
	)	
ANDREW HOLMES,	)	
	)	
Defendant.	)	

**ALBEMARLE COUNTY'S RESPONSE TO PLAINTIFF'S SUBPOENA DUCES TECUM**

COMES NOW Albemarle County, by counsel, and for its response to Plaintiff's subpoena duces tecum dated February 10, 2020, states as follows:

1. The County has no documents in its possession that are responsive to this request. The County objects to creating documents in response to the subpoena.
2. The County does not have any documents in its possession that are responsive to this request.
3. See attached documents.
4. The County does not have any documents in its possession that are responsive to this request. The County objects to creating documents in response to the subpoena.

ALBEMARLE COUNTY

By: /s/ Jim H. Guynn, Jr.

Jim H. Guynn, Jr. (VSB # 22299)

Guynn, Waddell, Carroll & Lockaby, P.C.

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*Counsel for Albemarle County*